

[counsel listed on following page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ZOYA KOVALENKO,

Plaintiff,

v.

KIRKLAND & ELLIS LLP, MICHAEL DE
VRIES, MICHAEL W. DEVRIES, P.C.,
ADAM ALPER, ADAM R. ALPER, P.C.,
AKSHAY DEORAS, AKSHAY S. DEORAS,
P.C., LESLIE SCHMIDT, LESLIE M.
SCHMIDT, P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-CV-05990-HSG

**DECLARATION OF KATE JUVINALL
IN SUPPORT OF STIPULATION TO
SPECIALLY SET BRIEFING
SCHEDULE ON DEFENDANTS'
MOTIONS FILED IN RESPONSE TO
PLAINTIFF'S COMPLAINT**

[N.D. CAL. CIV. L.R. 6-2]

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18 Plaintiff Zoya Kovalenko
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1 I, Kate Juvinall, hereby declare:

2 1. I am a member in good standing of the Bar of the State of California and am
3 admitted to practice before this Court. I am an attorney at the law firm of Orrick, Herrington &
4 Sutcliffe, LLP. I represent Defendants in this matter. I have personal knowledge of the matters
5 contained in this declaration. If called to testify to the matters set forth in this declaration, I would
6 do so competently.

7 2. I contacted Ms. Kovalenko by email on Friday, December 16, 2022, and proposed
8 that, given the upcoming holidays, stipulating to (1) an additional week for Ms. Kovalenko to file
9 her oppositions to Defendant Kirkland and Ellis LLP's motion to dismiss filed on December 16,
10 2022, and Defendants' anticipated motions to be filed on December 19, 2022, and (2) an
11 additional week for Defendants to file their replies.

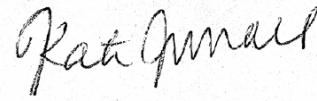
12 3. Ms. Kovalenko agreed to the stipulation on the condition that she be permitted
13 additional time to file any oppositions to Defendants' motions and request for judicial notice. The
14 Parties agreed to the following briefing schedule:

- 15 • Schedule for Motion filed on December 16, 2022:
 - 16 ○ January 9, 2023: Plaintiff's deadline to file opposition
 - 17 ○ January 23, 2023: Defendant Kirkland's deadline to file reply
- 18 • Schedule for Motions and Notice filed on December 19, 2022:
 - 19 ○ January 17, 2023: Plaintiff's deadline to file oppositions
 - 20 ○ January 31, 2023: Defendants' deadline to file replies

21 4. This is the Parties' first request for an order changing time to file oppositions and
22 replies to Defendants' motions and notice filed on December 16 and 19, 2022.

23 5. The only pending deadlines in the case are the Initial Case Management
24 Conference on January 12, 2023, and the Parties' deadline to submit a Joint Case Management
25 Statement on January 5, 2023. Defendants set these motions and notice for hearing on March 30,
26 2023 and April 6, 2023, the earliest available hearing dates. The Parties' request for a specially
27 set briefing schedule will thus not affect the case schedule or the hearing date.
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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on December 20, 2022.

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Kate Juvinall